

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

|  |   |  |
|--|---|--|
| <b>In re:</b>  | § | Case No. 18-30264-SGJ-11                                 |
|  | § | Case No. 18-30265-SGJ-11                                 |
| <b>ACIS CAPITAL MANAGEMENT, L.P.,<br/>ACIS CAPITAL MANAGEMENT GP,<br/>LLC,</b> | § |  |
| <b>Debtors</b>   | § | (Jointly Administered Under Case<br>No. 18-30264-SGJ-11) |
|  | § |  |
|  | § | Chapter 11   |

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|  |   |                                   |
|--|---|-----------------------------------|
| <b>ACIS CAPITAL MANAGEMENT, L.P.,<br/>ACIS CAPITAL MANAGEMENT GP,<br/>LLC, Reorganized Debtors,</b>  | § |                                   |
|  | § |                                   |
|  | § |                                   |
| <b>Plaintiffs,</b>   | § |                                   |
|  | § |                                   |
|  | § | <b>Adversary No. 20-03060-SGJ</b> |
| <b>vs.</b>   | § |                                   |
|  | § |                                   |
| <b>JAMES DONDERO, FRANK<br/>WATERHOUSE, SCOTT ELLINGTON,<br/>HUNTER COVITZ, ISAAC<br/>LEVENTON, JEAN PAUL SEVILLA,<br/>THOMAS SURGENT, GRANT SCOTT,<br/>HEATHER BESTWICK, WILLIAM<br/>SCOTT, AND CLO HOLDCO, LTD.,</b> | § |                                   |
|  | § |                                   |
|  | § |                                   |
| <b>Defendants.</b>   | § |                                   |

**DEFENDANT’S NOTICE OF INTENT TO TAKE THE ORAL DEPOSITION OF  
JOSHUA TERRY**

To: Acis Capital Management, L.P. and Acis Capital Management GP, LLC, by and through their counsel of record, Joseph Y. Ahmad, Shawn Bates, Alex Dvorscak, Thomas Cooke Ahmad, Zavitsanos & Mensing PLLC, 1221 McKinney St., Suite 2500, Houston, Texas 77010, [joeahmad@azalaw.com](mailto:joeahmad@azalaw.com); [sbates@azalaw.com](mailto:sbates@azalaw.com); [advorscak@azalaw.com](mailto:advorscak@azalaw.com); [tcooke@azalaw.com](mailto:tcooke@azalaw.com)

Please take notice that, beginning at 9:30 a.m. CST on September 17, 2024 and continuing until completed, Defendant James Dondero (“Dondero” or “Defendant”) will take the oral deposition of Joshua Terry.

The deposition will be conducted at 1700 Pacific Ave. Suite 2390 Dallas, Texas 75201. This deposition will be taken upon oral examination before an officer authorized by law to take such deposition and will continue from day to day until the deposition is completed. This deposition may be videotaped. You are invited to attend and cross-examine the witness.

Dated: September 13, 2024

Respectfully submitted,

**CRAWFORD, WISHNEW & LANG PLLC**

By: /s/ Michael J. Lang

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***Attorneys for Defendant***

**CERTIFICATE OF SERVICE**

I hereby certify that on, September 13, 2024, a true and correct copy of this document was served on Plaintiffs' counsel of record, via e-mail, in accordance with the FEDERAL RULES OF CIVIL PROCEDURE.

/s/ Michael J. Lang

Michael J. Lang